

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CHICAGO AREA JOINT WELFARE)	
COMMITTEE FOR THE POINTING,)	
CLEANING AND CAULKING)	
INDUSTRY, LOCAL 52, <i>et al.</i> ,)	
)	CIVIL ACTION
Plaintiffs,)	
)	NO. 24 C 120
v.)	
)	JUDGE JOHN F. KNESS
R.E.A. MASONRY, LLC,)	
an Illinois limited liability company,)	
)	
Defendant.)	

**MOTION FOR ENTRY OF JUDGMENT AND FOR AN ORDER
DIRECTING DEFENDANT TO TURN OVER ITS MONTHLY FRINGE
BENEFIT CONTRIBUTION REPORTS FOR APRIL 2024 FORWARD**

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on June 17, 2024 [Dkt. No. 12], request this Court enter judgment against Defendant, R.E.A. MASONRY, LLC., an Illinois limited liability company, pursuant to F.R.Civ.P. Rule 55(b). In support of this Motion, Plaintiffs state:

1. On June 17, 2024, this Court entered default against Defendant.
2. Plaintiff Funds' received Defendant's monthly fringe benefit contribution reports for the time period January 2024 through March 2024. These reports indicate Defendant is delinquent in contributions to the Funds in the total amount of \$12,897.90. (See Affidavit of John V. Kallianis).
3. Additionally, the amount of \$1,289.79 is due for liquidated damages. (Kallianis Aff. Par. 5).
4. Defendant has failed to submit its monthly fringe benefit contribution reports for the

months of April 2024 forward.

5. In addition, Plaintiffs' firm has expended \$705.00 for costs and \$722.75 for attorneys' fees in this matter. (See Affidavit of Catherine M. Chapman).

6. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$15,615.44.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$15,615.44.

Plaintiffs further request that this Court enter an order directing Defendant to submit its monthly fringe benefit contribution reports for the months of April 2024 forward within fourteen (14) days of the entry of the Order, and that the Court enter final judgment against Defendant after Plaintiffs determine all amounts due and owing from Defendant.

/s/ Destiny A. Collins

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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that I electronically filed the foregoing document (Motion for Entry of Judgment and for an Order Directing Defendant to Turn Over Report) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 27th day of June 2024:

Mr. Richard E. Ates, Registered Agent
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/s/ Destiny A. Collins

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